

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LB and DB, on behalf of their minor son, PB,

Civil Action No.:
7:15-cv-05238-NSR-LMS

Plaintiffs,

- against -

PAUL S. HINES and ANN H. HINES,

ECF CASE

Defendants.

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DECLARATION OF STEPHEN J. RIEBLING, JR.

I, STEPHEN J. RIEBLING, JR., declare as follows under penalties of perjury:

1. I respectfully submit this Declaration in opposition to Plaintiffs' motion, made pursuant to Fed. R. Civ. P. 56, seeking an Order for partial summary judgment (a) determining the liability of Defendant Paul S. Hines ("Hines") as to the Plaintiffs' First Claim for Sexual Battery, (b) determining Plaintiffs' entitlement to punitive damages, and (c) granting such other and further relief as this Court deems just and proper.

2. The sole purpose of this Declaration is to submit Exhibits before the Court. These Exhibits are as follows:

- a. Exhibit 1: A true and accurate copy of pages 90 to 125 and page 158 of Plaintiff PJB's Deposition of June 29, 2016;
- b. Exhibit 2: A true and accurate copy of the Criminal Jury Charge (CJI2d[NY] PENAL LAW ARTICLE 130.40(2)).
- c. Exhibit 3: A true and accurate copy of Plaintiff PB's Victim Impact Statement.

Dated: White Plains, New York
May 16, 2017

Yours, etc.,

RIEBLING, PROTO & SACHS, LLP

By: /s/ Stephen J. Riebling, Jr.
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